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9 Attorneys for Defendant

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN JOSE DIVISION

| | |
|-------------------------------------|----------------------------------|
| 14 JAVAD PEIROW-SALEHI, |) Civil No. 5:19-cv-03039-SVK |
| |) |
| 15 Plaintiff, |) STIPULATION FOR A FIRST |
| |) EXTENSION OF TIME FOR |
| 16 v. |) DEFENDANT TO FILE HER |
| |) MOTION FOR SUMMARY |
| 17 ANDREW SAUL, |) JUDGMENT AS MODIFIED |
| 18 Commissioner of Social Security, |) |
| |) |
| 19 Defendant. |) |
| 20 |) |

21
22 IT IS HEREBY STIPULATED by the parties, through their undersigned attorneys, and
23 with the approval of the Court, that Defendant shall have a first extension of time of 30 days to
24 file her motion for summary judgment. Defendant respectfully requests this additional time
25 because of an extremely heavy workload, including a Ninth Circuit responsive brief to complete
26 this week, and because the undersigned has significant use or lose leave, and will be on vacation
27 from December 20 through January 3, 2020.
28

1 The new due date for Defendant's motion for summary judgment will be
2 Wednesday, January 15, 2020.

3
4 Respectfully submitted,

5 SACKETT AND ASSOCIATES

6 Date: December 16, 2019

By: /s/ Harvey Peter Sackett*

7 HARVEY PETER SACKETT

* By email authorization on December 16, 2019

8 Attorney for Plaintiff

9
10 Date: December 16, 2019

DAVID L. ANDERSON

United States Attorney

11 By: /s/ Michael K. Marriott

12 MICHAEL K. MARRIOTT

13 Special Assistant United States Attorney

14 Attorneys for Defendant

15
16 Of Counsel

Jeffrey Chen

17 Assistant Regional Counsel

18 Social Security Administration

19
20 ORDER

21 APPROVED AS MODIFIED: For any further extension, Defendant must certify that it has (1)
22 read Plaintiff's brief and (2) met and conferred with Plaintiff - either in person or by telephone,
not by email - regarding Plaintiff's substantive claims.

23 SO ORDERED.

24
25 DATED: December 17, 2019



26 HONORABLE SUSAN VAN KEULEN

27 UNITED STATES MAGISTRATE JUDGE

28 Stipulation to Extend Def.'s MSJ AS MODIFIED